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July 27, 2020

Date: 7/28/2020

New York, New York

USDC SDNY
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The requested modification of bail conditions is DENIED.

BY ECF

Hon. Mary Kay Vyskocil
United States District Court Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Navarro, et al.

20-CR-00160

Dear Judge Vyskocil:

I represent Dr. Kristian Rhein who is currently on bail pending the above-referenced prosecution. Dr. Rhein's bail conditions have certain travel restrictions. The purpose of this application is to seek permission for Dr. Rhein to travel to Connecticut on Saturday, August 1, 2020, and Sunday, August 2, 2020, to attend a lacrosse tournament in New Caanan where both of his daughters will be playing.

It is their intention to drive to New Caanan on Saturday morning and return that evening, and again drive to New Caanan on Sunday, returning later that evening. The tournament will be held at the New Caanan High School, 11 Farm Road, New Caanan, Connecticut. The time for the tournament will be 6 a.m. to 8 p.m.

I have copied the Government by email and ECF and Pre-Trial Services by email regarding this pending application.

Respectfully submitted,

STEPHEN P SCARING

cc: AUSA Andrew Adams (by email and ECF)
Pre-Trial Services Officer Marnie Gerardino (by email)
SPS/cn